

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No. 08 B 26644
)	
Deborah R. Penny)	Chapter 13
)	
Debtor.)	Judge Eugene R. Wedoff

NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on April 22, 2010, we filed with the Clerk of the U.S. Bankruptcy Court for the Northern District of Illinois, Eastern Division, **SHOREBANK'S OBJECTION TO TRUSTEE'S NOTICE OF PAYMENT OF FINAL MORTGAGE CURE AMOUNT**, a true and correct copy of which is attached hereto and is hereby served upon you.

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalties of perjury as provided by law that I caused this notice and described document(s) to be served upon the above-named party(ies) by [X] addressing a copy to the above-named and depositing the same in the U.S. Mail at 30 North LaSalle Street, Chicago, Illinois, with proper postage prepaid; [] hand delivering a copy to via messenger/courier to the address(es) listed above; [] transmitting via facsimile to the telephone numbers listed above, [X] transmitting via Court ECF Notification System, on April 22, 2010, at or before 5:00 p.m.

/s/ Patience R. Clark

Patience R. Clark (6282669)
PATIENCE R. CLARK, P.C.
30 N. LaSalle Street, Suite 3400
Chicago, IL 60602
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SERVICE LIST

Marilyn O. Marshall
224 S. Michigan Avenue
Suite 800
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via Electronic Mail

Robert J. Semrad and Associates
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via Electronic Mail

Deborah R. Penny
9033 S. Ellis
Chicago, IL 60619
Via Regular Mail

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**SHOREBANK'S OBJECTION TO TRUSTEE'S NOTICE
OF PAYMENT OF FINAL MORTGAGE CURE AMOUNT**

NOW COMES the Creditor, SHOREBANK, by and through its attorneys, PATIENCE R. CLARK, P.C., and objects to the Standing Trustee's Notice of Payment of Final Mortgage Cure Amount, and in support thereof, the SHOREBANK states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. §1334 and the Local Rule 2.33 of the United States District Court for the Northern District of Illinois.
2. Debtor filed a petition for relief under Chapter 13 of the Bankruptcy code on October 3, 2008.
3. SHOREBANK holds a mortgage on the property located at 9033 S. Ellis, Chicago, IL 60619.
4. At the time Debtor filed her Chapter 13 Voluntary Petition, the mortgage owed to SHOREBANK, dated July 18, 2008, had an unpaid principal balance in the amount of \$68,732.04, with a pre-petition arrearage of \$2,570.27.
5. Debtor elected to make all accruing post-petition mortgage payments directly to ShoreBank in her Chapter 13 Plan.

6. Debtor has failed to make timely post-petition payments to ShoreBank and currently has a default in the amount of \$4,867.71 (this amount also includes late charges).

7. Finally, Debtor's account accrued attorneys' fees associated with the cost of preparing, filing, and appearing in court for Objection to Confirmation of Chapter 13 Plan in the amount of \$250.00.

8. SHOREBANK, adopts the attached itemization of post-petition obligations along with payment history.

WHEREFORE, SHOREBANK prays that this Honorable Court:

- A. Enter an order releasing SHOREBANK from treating Debtor's mortgage current and reinstated; and
- B. Grant such further and other relief as this Court deems proper and just.

Respectfully Submitted,

SHOREBANK

By: /s/ Patience R. Clark.
One of its Attorneys

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